



requires the Court to calculate an alleged diminished value of their education. All claims should therefore be dismissed.

4. Plaintiffs' MMPA claims should also be dismissed because they are factually deficient and because Plaintiffs' allegations demonstrate that they pursued coursework at the University for a business purpose, which requires dismissal of their MMPA claim for lack of standing.

5. Plaintiffs fail to allege any facts to demonstrate that their claims involve a transaction in or from Missouri as required under Mo. Rev. Stat. § 407.020.1.

6. The Petition's allegations also establish that the transactions at issue were for a business purpose—not a personal, family, or household purpose as required under Mo. Rev. Stat. § 407.05.1(1).

7. Plaintiffs lack standing under the MMPA, and Count II should be dismissed.

8. The University further fully incorporates by reference its contemporaneously filed memorandum in support.

WHEREFORE, Defendant Webster University respectfully requests that the Court grant this motion, dismiss all claims with prejudice, award Defendant Webster University its costs and attorney fees incurred, and grant such further relief as the Court deems just and proper.

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system and emailed to the following:

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